

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
---	-------------------------------

This document relates to:

Federal Insurance Co. v. al Qaida, 03-CV-6978 (RCC) (S.D.N.Y.)

Kathleen Ashton v. Al Qaeda Islamic Army, Case No. 02-CV-6977 (RCC) (S.D.N.Y.)

Thomas E. Burnett, Sr. v. Al Baraka Investment & Development Corp., Case No. 03-CV-9849 (RCC) (S.D.N.Y.)

**PLAINTIFFS' SUPPLEMENTAL REQUESTS FOR PRODUCTION OF DOCUMENTS
DIRECTED TO THE INTERNATIONAL ISLAMIC RELIEF ORGANIZATION**

COZEN O'CONNOR
1900 Market Street
Philadelphia, PA 19103
Phone: (215) 665-2000

**PLAINTIFFS' SUPPLEMENTAL REQUESTS FOR PRODUCTION OF DOCUMENTS
DIRECTED TO THE INTERNATIONAL ISLAMIC RELIEF ORGANIZATION**

Plaintiffs in Federal Insurance Co. v. al Qaida, Case No. 03-CV-6978 (RCC), Kathleen Ashton v. al Qaeda Islamic Army, Case No. 02-CV-6977 (RCC), and Thomas E. Burnett, Sr. v. Al Baraka Inv. & Dev. Corp., Case No. 03-CV-9849 (RCC) (collectively "Plaintiffs"), propound and serve on the International Islamic Relief Organization, (hereinafter "IIRO" or "Defendant") the following Supplemental Requests for Production of Documents to be answered fully and under oath, pursuant to Rule 34 of the Federal Rules of Civil Procedure, within 30 days of their receipt.

The "Instructions" and "Definitions" set forth in the Plaintiffs' First Set of Requests for Production of Documents Directed to the International Islamic Relief Organization are incorporated herein by reference, except that the following definitions shall also apply:

DEFINITIONS

1. The terms "index" or "indexes" shall mean anything that serves to guide, list, point out, or otherwise facilitate reference to, including without limitation, catalogs, directories, inventories, checklists, outlines, itemizations, tables, charts, rosters, tabulations, and summaries.

2. The term "electronic database" shall mean any electronic, computerized, or automated system capable of assisting a user in selecting desired pieces of data from an organized body of information.

**PLAINTIFFS' SUPPLEMENTAL REQUESTS FOR PRODUCTION OF DOCUMENTS
DIRECTED TO THE INTERNATIONAL ISLAMIC RELIEF ORGANIZATION**

1. Please provide any and all indexes, electronic databases or other documents that detail, describe, or catalog, either individually or generally, the documents and materials stored in any IIRO office, branch, subsidiary, and/or third-party facility used by the IIRO for storage.

ANSWER:

2. Please provide any and all indexes, electronic databases or other documents that detail or describe, in whole or in part, any system(s) or methodologies pursuant to which documents or other materials in any IIRO office, branch, subsidiary, and/or third-party facility used by the IIRO for storage, are organized.

ANSWER:

3. Please provide any and all documents relating to any individual currently detained or incarcerated in Cuba, Afghanistan, or elsewhere in connection with the global war on terrorism, including without limitation, all documents relating to any meetings, interviews, or dialogue with persons held at Guantanamo Bay.

ANSWER:

4. Please provide any and all documents relating to any IIRO employee, representative, agent, or volunteer who has been arrested, detained, or incarcerated in connection with the global war on terrorism, including without limitation, any and all employment records for such individuals.

ANSWER:

Respectfully submitted,

Dated: April 21, 2006

BY: _____/s/

Stephen A. Cozen, Esq.
Elliott R. Feldman, Esq.
Sean P. Carter, Esq.
J. Scott Tarbutton, Esq.
1900 Market Street
Philadelphia, PA 19103
Tele: (215) 665-2000
Fax: (215) 665-2013

Attorneys for *Federal Insurance* Plaintiffs

Ronald L. Motley, Esq. (RM-2730)
Jodi Westbrook Flowers, Esq.
Donald A. Migliori, Esq.
Michael Elsner, Esq. (ME-8337)
MOTLEY RICE LLC
28 Bridgeside Boulevard
P.O. Box 1792
Mount Pleasant, South Carolina 29465
Telephone: (843) 216-9000

Paul J. Hanly, Jr., Esq. (PH-5486)
Jayne Conroy, Esq. (JC-8611)
Andrea Bierstein, Esq. (AB-4618)
**HANLY CONROY BIERSTEIN &
SHERIDAN, LLP**
415 Madison Avenue
New York, NY 100 17-11 1 1
Telephone: (212) 401-7600

Attorneys for *Burnett* Plaintiffs

James P. Kreindler, Esq. (JK7084)
Justin T. Green, Esq. (JG0318)
Andrew J. Maloney III, Esq. (AM8684)
Vincent Ian Parrett, Esq. (VP5092)
KREINDLER & KREINDLER LLP
100 Park Avenue
New York, NY 10017-5590
(212) 687-8181

Attorneys for *Ashton* Plaintiffs

PHILA1\2461490\1